

**GWA094**

**Policy Against Slavery and Trafficking in  
Persons**

# Policy Against Slavery and Trafficking in Persons

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## 1. Overview

GWA Group Limited (**GWA**) values human rights and is committed to ensuring that all business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. It is vital for us to maintain this reputation as it generates confidence in our business.

Modern Slavery (as defined in Divisions 270 and 271 of the *Criminal Code 1995* (Cth) (**Modern Slavery**) is a crime and a violation of fundamental human rights. It takes various forms, such as:

- **slavery**: one person treats another as though he or she owns that person and that person is deprived of his or her freedom.
- **servitude**: a person is coerced to provide services, is forced to live on another person's property and cannot change his or her condition.
- **forced labour**: a person is forced to involuntarily work or to provide a service without remuneration under the menace of a penalty.
- **trafficking** in persons (including trafficking of orphanage children): a person arranges or facilitates the travel of another person to be exploited, without that person's knowledge or consent. This can be even where the person consents to the travel as they may have been deceived or unduly influenced.
- **forced marriage**: a person enters into a marriage without freely and fully consenting, because he or she was coerced, threatened or deceived or otherwise incapable of understanding the nature and effect of the marriage ceremony.
- **child labour**: this is defined as work that deprives children of their childhood, the opportunity to attend school and fulfill their potential and that is harmful to their physical and mental development.
- **debt bondage**: a person's pledge of labour or services as security for the repayment of a debt or other obligation, but there is no hope of actually repaying the debt. The services required to repay the debt, or the time in which to repay the debt, may be undefined.
- other slavery-like practices.

The Modern Slavery Act imposes obligations on GWA to make annual public reports about its actions to address Modern Slavery risks in its business operations and supply chain.

The Modern Slavery Act applies to all GWA operations and its supply chain.

This document is directed to assisting GWA to comply with its obligations under the Modern Slavery Act and reducing the modern slavery risks posed to its business and its supply chain.

## 2. Purpose

GWA takes its compliance with its statutory obligations seriously. As noted above, this document is directed to (amongst other things) assisting GWA to comply with its obligations under the Modern Slavery Act.

GWA has a zero-tolerance approach to Modern Slavery within its business and supply chain and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place in its own business or in any of its supply chain.

## 3. Scope

This Policy Against Slavery and Trafficking in Persons (**Policy**) applies to all directors, officers and employees (collectively, **you**) of GWA. This Policy should also be read in conjunction with the GWA Code of Conduct which serves as a guide for how to conduct yourself as a member of the GWA team.

It is critical that you comply with the obligations set out in this document. Modern Slavery can cause genuine and significant harm to the individuals affected and there are significant reputational, financial, market and operational risks for GWA if Modern Slavery risks are not properly detected and addressed.

This document sets out important information as to the steps that GWA will take in response to identifying a Modern Slavery risk. You must familiarise yourself with this document to assist GWA in effectively carrying out its duties in compliance with the Modern Slavery Act.

## 4. Governance

This Policy and GWA's approach to managing Modern Slavery issues is overseen by our Board, the Audit and Risk Committee, the Ethical Standards Officer and the Leadership Teams. The responsibilities and accountabilities are set out below:

- **Board:** GWA's Board is responsible for approving this Policy. Pursuant to section 13 of the Modern Slavery Act, the Board of Directors commits to publishing a public statement annually, setting out the steps it has taken during that particular financial year to ensure that Modern Slavery is not taking place in any of our supply chain or within our own business
- **Audit and Risk Committee:** The Audit and Risk Committee is a committee of the Board. Modern Slavery forms part of GWA's internal audit program, which is overseen by the Audit and Risk Committee. This program audits internal control systems and procedures to ensure they are effective in countering Modern Slavery. The responsibilities of this Committee extend to reviewing the application of relevant legislative and regulatory requirements concerning Modern Slavery, such as the annual reporting requirement under the Modern Slavery Act and recommending the approval of the report by the Board.
- **Ethical Standards Officer:** Our Ethical Standards Officer is responsible for the administration and maintenance of this Policy. Our Ethical Standards Officer also has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and

monitoring internal control systems and procedures to ensure they are effective in countering Modern Slavery. The Ethical Standards Officer is entitled to call upon any resources that he or she considers necessary to assist the Ethical Standards Officer in the performance of their role, provided they first consult with the Managing Director and CEO. The Ethical Standards Officer is the Company Secretary.

- **Leadership Teams:**

Group Chief Financial Officer	Oversees the procurement function, and is responsible for the procurement of goods and services which are not for re-sale (ie non-inventory).
Group General Manager – Supply Chain and Innovation	Oversees the procurement of goods for resale in GWA’s business.
Group General Manager – People and Performance	Is responsible for ensuring systems and controls exist to manage Modern Slavery risks in our operations.  All employees will be made aware of this Policy and key personnel will be provided with sufficient training to enable them to fulfil the role(s) which are relevant to them.
Executive Leadership Team and Senior Leadership Team	While everyone at GWA shares responsibility for ensuring that goods and services are procured ethically, management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given appropriate training on it and the issue of Modern Slavery.
Functional teams	Contract owners and contract managers across our business are responsible for the day-to-day execution of this Policy.

This document will be reviewed on an annual basis or when required in response to legislative amendments, changes to regulatory guidance, relevant court decisions or as a result of the identification of improvement opportunities during the course of a post-incident review.

## 5. Policy Statement

GWA prohibits all forms of Modern Slavery and seeks to educate and influence its employees and suppliers to ensure that no form of Modern Slavery is taking place in its own business operations or in its supply chain.

**Version:** 2

GWA employees, contractors, subcontractors, vendors, suppliers, partners, representatives, agents and others through whom GWA conducts business must not engage in any practice that constitutes any form of Modern Slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.
- Using forced labour in the performance of any work.
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment or offering of employment/contract positions to candidates; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs, any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labour laws of the country in which the recruiting takes place.
- Charging applicants / candidates recruitment fees.
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment for workers recruited outside the host country.
- If required by law or contract, failing to provide or arrange housing that meets the host country's housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

GWA is committed to the Policy and monitors the measures in place that are designed to prevent and detect Modern Slavery in our business and our supply chain. The GWA programme in this regard contains the following elements:

- a) A policy which articulates the commitment of GWA to prevent violations of the Modern Slavery Act and the Modern Slavery offences within the *Criminal Code 1995* (Cth) within its operations and supply chain, being this Policy.
- b) Communication of this Policy and all relevant elements of the programme to all employees throughout GWA and to our business partners and supply chain.
- c) The assessment of Modern Slavery risks within GWA operations and supply chain and the development of effective, efficient and transparent controls to reduce exposure to those risks.
- d) The adoption of anti-slavery requirements in contracts.

- e) The conduct of appropriate due diligence on business partners, agents, contractors, consultants, subcontractors and suppliers coupled with a requirement that they implement procedures which incorporate the principles of the Modern Slavery Act.
- f) Training of all relevant individuals throughout GWA so that compliance with this Policy is the duty of all relevant employees at all levels and so that individuals can recognise Modern Slavery practices and take steps to avoid the same.
- g) GWA is also committed to ensuring there is transparency in our own business operations and in our approach to tackling Modern Slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act.
- h) In addition, GWA provides safe and fair working conditions for all its employees and ensures that no child labour is employed, in line with minimum age laws, within the countries that it operates. GWA expects the same standards from all of its contractors, suppliers and other business partners and, as part of its contracting processes, includes specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children and we expect that our suppliers will hold their own suppliers to the same standards.

## 6. Investigations and Audits

GWA will perform investigations and internal or external audits to verify that business is being conducted in compliance with this Policy.

All of GWA's employees and third parties through whom GWA conducts business are required to fully and promptly cooperate with the internal and external auditors and investigators of GWA, and must respond fully and truthfully to their questions and requests for information. Any failure by an employee to completely cooperate, or any action to hinder an investigation or audit, including for example, hiding or destroying any information or documentation, providing false answers or false information, or deleting emails or other documents, may be grounds for disciplinary action, up to and including termination, subject to applicable law.

## 7. Reporting

Internal reporting is critical to the success of GWA and it is both expected and valued. You are required to be proactive and promptly report any suspected violations of the Policy or any illegal or unethical behaviour that you become aware of. Complaints will be kept confidential and will be dealt with appropriately. You will not experience retribution or retaliation for a complaint made in good faith.

If you believe that a breach of this Policy has occurred or is likely to occur, you must notify your manager and the GWA Ethical Standards Officer or the other Disclosure Officers as soon as possible. Alternatively, if you are uncomfortable in making a disclosure to any of these individuals, you may make a notification through any of the options set out in GWA's Whistleblower Policy (GWA1012).

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of a GWA supply chain constitutes

any of the various forms of Modern Slavery, your query should be raised with your manager and the GWA Ethical Standards Officer.

GWA aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if those concerns turn out to be mistaken. GWA is committed to ensuring staff do not suffer any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery of whatever form is or may be taking place in any part of our business or supply chain. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the GWA Ethical Standards Officer or the other Disclosure Officers immediately.

## 8. Crisis Management and Business Continuity

When confronted with a potential Modern Slavery incident or risk, the Ethical Standards Officer should consider whether the incident or risk may give rise to obligations under GWA's crisis management and business continuity plans.

## 9. Breaches of this Policy

The Ethical Standards Officer will arrange an investigation into reported breaches of this Policy. The investigation may utilise internal and external resources that the Ethical Standards Officer considers necessary. The outcome of the investigation including recommended actions will be reported to the Executive Leadership Team with material matters reported to the Board of Directors.

Any employee who breaches this Policy by engaging in or conspiring to engage in any Modern Slavery conduct will face disciplinary action. This could, in the most severe circumstances include immediate dismissal for misconduct or gross misconduct and, if warranted, legal proceedings may be brought against the employee.

GWA may terminate its relationship with individuals, organisations and suppliers working on its behalf or engaged by it if they breach this Policy.

## 10. Key Contacts

If you have any questions about this Policy please contact the Ethical Standards Officer or the other Disclosure Officers. The key contact details are outlined below.

### **Ethical Standards Officer:**

Ernie Lagis  
Company Secretary and General Counsel  
Phone: +61 2 8825 4426  
Email: elagis@gwagroup.com

### **Other Disclosure Officers:**

Calin Scott  
Group Chief Financial Officer  
Phone: +61 (0)400 927 185  
Email: cscott@gwagroup.com

Patricia Oliver  
 Group General Manager People & Performance  
 Phone: +61 (0)408 979 015  
 Email: poliver@gwagroup.com

### **GWA's Whistleblower Policy**

As stated earlier, there are several options for making a disclosure in accordance with GWA's Whistleblower Policy – see [GWA1012 Whistleblower Policy \(sharepoint.com\)](#).

## **11. Version History**

<b>Version No.</b>	<b>Created/Updated by:</b>	<b>Approved by:</b>
<b>1.</b>	Executive Director (February 2020)	Board of Directors (February 2020)
<b>2</b>	Company Secretary & General Counsel (February 2022)	Board of Directors (February 2023)